

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

BELL SEMICONDUCTOR, LLC,

Plaintiff,

v.

AMS SENSORS USA, INC. and AMS-OSRAM AG,

Defendants.

Civil Action No. 4:23-cv-00070 SDJ

[PROPOSED] SCHEDULING ORDER

Pursuant to the Court's Order Governing Proceedings (Dkt. No. 15) and the E.D. Tex. Patent Rules, it is hereby ORDERED that the parties shall adhere to the following Schedule. Dates in bold typeface (or written by hand and underlined) may not be changed without the consent of the Court.

<u>Deadline or Event</u>	Joint Proposal Based on Court's Pretrial Date	Joint Proposal Based on one month extension to Court's Pretrial Date (same dates unless otherwise noted)
Mediation (to be discussed at case management conference)		
P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions (and P.R. 3-2 document production) to be served.	11/30/2023	
Join additional parties.	12/27/2023	
P.R. 3-3 Invalidity Contentions (and P.R. 3-4 Document production) to be served. To the extent not already required to be disclosed, exchange Mandatory Disclosures on all issues, including damages.	1/15/2024	
Parties to exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112, ¶ 6 (P.R. 4-1).	1/22/2024	
Privilege logs to be exchanged by parties (or a letter to the	1/22/2024	

Court stating that there are no disputes as to claims of privileged documents).		
Parties to exchange preliminary proposed claim construction and extrinsic evidence supporting same. (P.R. 4-2).	1/29/2024	
Parties' Final Amended Pleadings.	2/19/2024	
Joint Claim Construction and Prehearing Statement to be filed. (P.R. 4-3). Provide an estimate of how many pages are needed to brief the disputed claims.	2/23/2024	
Respond to Amended Pleadings.	3/12/2024	
Completion date for discovery on claim construction. (P.R. 4-4).	3/24/2024	
Opening claim construction brief. (P.R. 4-5(a)).	4/5/2024	
Responsive claim construction brief. (P.R. 4-5(b)).	4/19/2024	
Reply claim construction brief. (P.R. 4-5(c)).	4/26/2024	
Submit technology synopsis/tutorial (both hard copy and disk).	4/11/2024	
Parties to file joint claim construction and chart. (P.R. 4-5(d)). Parties shall work together to agree on as many claim terms as possible.	4/29/2024	
Claim Construction Hearing at 10:00 a.m. at the United States Courthouse, 7940 Preston Road, Plano, TX 75024.	Thursday, May 9, 2024	
Fact Discovery Deadline. Deadline for Initial Mandatory Disclosure of all persons, documents, data compilations and tangible things, which are relevant to a claim or defense of any party and which has not previously been disclosed. This deadline is not an extension of earlier deadlines set out in this Court's order or the Patent Rules, nor an excuse to delay disclosure of information. It is a "catchall" deadline for provision of all remaining information which may be relevant to a claim or defense of any party at trial.	6/13/2024	
Parties shall notify the Court of the name, address, and telephone number of the agreed-upon mediator, or request that the Court select a mediator, if they are unable to agree on one.	6/20/2024	
Parties with burden of proof to designate Expert Witnesses other than claims construction experts and provide their expert witness reports, to include for ALL experts all information set out in Rule 26(a)(2)(B).	7/11/2024	
Comply with P.R. 3-7 (Designation of Willfulness Opinions).	7/11/2024	
Parties to Designate Expert Witnesses on issues for which the parties do not bear the burden of proof, and provide their expert witness report, to include for ALL experts all information set out in Rule 26(2)(B).	7/25/2024	
Mediation deadline.	8/1/2024	
Expert Discovery deadline.	8/8/2024	

File objections to any expert, including Daubert motions. Such objections and motions are limited to ten pages each.	8/18/2024	
File Dispositive Motions and any other motions that may require a hearing. Regardless of how many dispositive motions a party files, each party is limited to a total of sixty pages for such motions. Each individual motion shall comply with Local Rule CV-7.		
Responses to motions shall be due in accordance with Local Rule CV-7(e).		
Meet and confer with counsel and unrepresented parties to determine how the parties will prepare the Joint Final Pretrial Order, and Proposed Jury Instructions and Verdict Form.	12/2/2024	1/2/2025
Motions in limine due.	12/6/2024	1/6/2025
File Joint Final Pretrial Order. Exchange Exhibits and deliver copies to the Court. At this date, all that is required to be submitted to the Court is a hyperlinked exhibit list on disk (2 copies) and no hard copies.	12/6/2024	1/6/2025
Video Deposition Designation due. Each party who proposes to offer a deposition by video shall serve on all other parties a disclosure identifying the line and page numbers to be offered. All other parties will have seven calendar days to serve a response with any objections and requesting cross examination line and page numbers to be included. Counsel must consult on any objections and only those which cannot be resolved shall be presented to the Court. The party who filed the initial Video Deposition Designation is responsible for preparation of the final edited video in accordance with all parties' designations and the Court's rulings on objections.	12/9/2024	1/9/2025
Response to motions in limine due.	12/23/2024	1/23/2025
File objections to witnesses, deposition extracts, and exhibits, listed in pre-trial order. (This does not extend the deadline to object to expert witnesses.) If numerous objections are filed, the Court may set a hearing prior to docket call.	12/23/2024	1/23/2025
File Proposed Jury Instructions/Form of Verdict (or Proposed Findings of Fact and Conclusions of Law).	12/23/2024	1/23/2025
File Proposed Voir Dire Questions.	12/23/2024	1/23/2025
Final Pretrial Conference at 1:30 p.m. at the United States Courthouse located at 7940 Preston Road, Plano, TX 75024.	January 6, 2025	TBD by Court or February 6, 2025
10:00 a.m. Jury Selection and Trial at the United States Courthouse located at 7940 Preston Road, Plano, TX 75024.	To be determined	

